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Attorneys for Defendant
CALIX, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

| | | |
|---------------------------|---|-----------------------------------|
| TRACY HANKINS, |) | CASE NO. 5:19-cv-07547 |
| |) | |
| Plaintiff, |) | |
| |) | STIPULATION AND [PROPOSED] |
| v. |) | ORDER TO CONTINUE DATES |
| |) | IN INITIAL CASE |
| CALIX, INC. AND DOES 1-25 |) | MANAGEMENT ORDER AND |
| , |) | DEADLINE FOR COMPLETION |
| |) | OF MEDIATION |
| Defendants. |) | |
| |) | |
| |) | |
| |) | |

Plaintiff Tracy Hankins (“Plaintiff”) and Defendant Calix, Inc. (“Defendant”) (collectively, the “Parties”) hereby stipulate and respectfully request the Court to continue the dates in the Initial Case Management Order and the Deadline for Completion of Mediation. In support of this request, the Parties state as follows:

WHEREAS, Plaintiff filed her Complaint in this action on November 15, 2019, alleging Unequal Pay Act violations, discrimination, retaliation and related causes of action;

WHEREAS, on February 18, 2020, the Court entered its initial Case Management Order with a May 3, 2021 trial date;

WHEREAS, on July 27, 2020, the Court entered an Order which extended the deadline to complete private mediation until September 20, 2020, which was necessitated by COVID-19 and the related stay-at-home orders;

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1 WHEREAS, Defendant substituted its counsel on August 14, 2020;

2 WHEREAS, Defendant's prior counsel did not complete any depositions prior to the
3 substitution;

4 WHEREAS, Plaintiff has cooperated with Defendant's new counsel to confirm the
5 depositions of Plaintiff's supervisor and Plaintiff for, respectively, September 10 and 11, 2020;

6 WHEREAS, the Parties are diligently proceeding with discovery in order to have a
7 fruitful and productive mediation session, but an additional month is necessary due to
8 Defendant's new counsel having just entered into the case;

9 IT IS HEREBY STIPULATED AND REQUESTED, by and between the Parties that this
10 Court continue the dates in the initial Case Management Order and the completion of mediation
11 to the following new dates, which will not affect the Final Pretrial Conference and Trial dates of
12 April 15, 2021 and May 3, 2021:

- 13 • Last Day to Complete Private Mediation – October 30, 2020;
- 14 • Close of Fact Discovery – November 30, 2020;
- 15 • Further Case Management Conference – December 14, 2020 (Statement due
16 December 7, 2020);
- 17 • Opening Expert Disclosures – December 21, 2020;
- 18 • Rebuttal Expert Disclosures – January 18, 2020;
- 19 • Close of Expert Discovery – February 18, 2020;
- 20 • Dispositive Motion Deadline – March 12, 2020;
- 21 • Last Day to Hear Dispositive Motions – April 8, 2020.

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Respectfully submitted,

Dated: August 20, 2020

GORDON REES SCULLY MANSUKHANI,
LLP

By: /s/ Brad M. Weintraub

Michael A. Laurenson
Brad M. Weintraub
Attorneys for Defendant
CALIX, INC.

Dated: August 20, 2020

HOYER & HICKS

By: /s/ Nicole B. Gage

Richard Hoyer
Ryan L. Hicks
Nicole B. Gage
Attorneys for Plaintiff
TRACY HANKINS

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[PROPOSED] ORDER

Based on the above stipulation by the parties, and for good cause shown, **IT IS ORDERED THAT:**

1. The prior mediation completion date of September 20, 2020 is vacated.
2. Mediation shall be completed by October 30, 2020.
3. The dates in the Initial Case Management Order are vacated and the following are the new dates:
 - Close of Fact Discovery – November 27, 2020;
 - Further Case Management Conference – December 14, 2020 (Statement due December 7, 2020);
 - Opening Expert Disclosures – December 21, 2020;
 - Rebuttal Expert Disclosures – January 18, 2020;
 - Close of Expert Discovery – February 18, 2020;
 - Dispositive Motion Deadline – March 12, 2020;
 - Last Day to Hear Dispositive Motions – April 8, 2020.
4. The Final Pretrial Conference and Trial Dates of April 15, 2020 and May 3, 2021 remain the same.

IT IS SO ORDERED.

Dated:

SUSAN VAN KEULEN
United States Magistrate Judge